

EXHIBIT B

KELAHER, CONNELL & CONNOR, P.C.

SUITE 209

THE COURTYARD

1500 U.S. HIGHWAY 17 NORTH

P.O. DRAWER 14547

SURFSIDE BEACH, SOUTH CAROLINA 29587

EDWARD T. KELAHER*

GENE M. CONNELL, JR.

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LISA POE DAVIS

*OF COUNSEL

AREA CODE 843

238-5648

FAX: 238-5050

May 17, 2021

Sodexo Operations, LLC
c/o Corporate Creations Network, Inc
6650 Rivers Ave.
North Charleston, SC 29406

Re: My Client: Jamie Wilson Drescher
Date of Incident: 03/22/2021
Our File No.: 2021-0123D

Dear Sir or Madam:

The records of the South Carolina Secretary of State reflect that your company is the registered agent for Sodexo Operations, Inc. As such, I am hereby placing you on notice that our law firm represents Ms. Drescher in regards to injuries sustained as a result of the above incident. My client slipped and fell after an employee of Sodexo mopped a floor without placing warning signs in the area mopped. I am requesting that you turn this letter over to Sodexo and request that it turn this matter over to its insurance carrier or provide me with the name and address of the carrier.

We believe that electronically stored information ("ESI") to be an important source of discovery. Please accept and acknowledge this letter as notice of preservation requirements of ESI that may contain evidence important to the above legal matter in possession of Sodexo.

The term "your" may be interpreted as any parent company, subsidiary, predecessors, successors, divisions or affiliates, and their respective officers, directors, agents and employees, including a third-party that may provide information technology assistance to the Sodexo.

This preservation notice applies to the Sodexo's computer systems, services, and devices used by the defendants' daily business operations. The term computer system includes, but is not limited to personal computers, laptops, tablets, cell phones and other devices used to access business networks or e-mail systems. All electronic communications, electronically stored documents, records, images, graphics, recordings, word processing documents, spreadsheets, databases, telephone logs, user information, internet usage files, network configurations, legacy systems, electronic storage devices and other system data maintained for any business purpose that may contain information or lead to discoverable evidence in this litigation.

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Furthermore, Sodexo should take affirmative steps to prevent anyone with access to its data, systems and archives from seeking to modify, destroy or manipulate ESI. Sodexo's preservation obligation extends beyond ESI in your care, possession or custody. Any third-party that provides information technology assistance to its company and has access to manipulate data owned by it may and should be notified of the preservation requirements. In addition, if business associates that receive or manage its company's data for purposes of review, analysis, storage or other business purposes should be notified of the preservation requirements. These entities are subject to the preservation requirements and under Sodexo's direction or control.

If security cameras were in operation in the area where this incident occurred, I am requesting a copy of footage for that date.

Please acknowledge receipt of this letter within five (5) days of receipt.

With warm personal regards, I am

Sincerely,



Lisa Poe Davis

LPD/dh

Acknowledged and Executed on this _____ day of May, 2021

cc: Jamie Drescher (via email)
J. Alan Bass, Esq. (via email)